

London Plan Examination in Public – Written Statement

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Matter 10

M10. Should the vast majority of London’s development needs be met within London?

- a) Is the approach of seeking to accommodate the vast majority of identified development requirements between 2019 and 2041 within London justified and would so doing contribute to the objective of achieving sustainable development?
- b) Alternatively, would accommodating more of London’s development needs in the wider South East and beyond better contribute to the objective of achieving sustainable development?

Key argument: The Assembly supports the continuation of the ‘compact city’ approach, the most sustainable urban form, that has been a feature of all London Plans since 2000. To date it has been mainly focussed on intensification of land use in central and inner East London. This Plan seeks to extend implementation of the approach to other areas of London, particularly the suburbs.

The Assembly advocates an approach that seeks to intensify development on brownfield sites, town centres and Opportunity Areas initially. This should be sufficient to accommodate London’s projected growth, certainly in the longer-term of the Plan period, without requiring development outside London in the wider South East.

Denser neighbourhoods bring with them many advantages, including the use of shared supporting infrastructure and more vibrant, socially inclusive mixed communities with more diverse employment. Transport accessibility allows for higher density housing, and in turn high density housing promotes investment in transport infrastructure. Any additional infrastructure based on supporting intensification brings with it the advantage of reducing investment per head - the benefits of infrastructure development linked to employment and housing development is therefore amplified and the business case for investment is made more easily.

Intensification brings with it many advantages including the use of shared supporting infrastructure. Any additional infrastructure based on supporting intensification brings with it the advantage of reducing ‘unit costs’ – the benefits of infrastructure development

linked to employment and housing development is therefore amplified, and the business case for investment is made easier.

In the longer-term London needs to have a much better relationship with its functional urban area, and there is scope for more development in the wider South East that is potentially linked to new transport investment. The Plan needs to be clearer on the scope of this option.

Summary

The Assembly supports the principle of a 'compact city' approach that seeks to accommodate the majority of London's development requirements within its boundaries.

The compact-city approach requires high-density, mixed-use, mixed-income developments to be located near well connected transport nodes and town centres to improve access to jobs and services, while reducing reliance on private cars. Large numbers of people can sustain schools, local shops and other facilities in a way that a more dispersed community cannot. London's established network of well-connected town centres is well suited to this approach.

To be sustainable, new homes must be supported by a range of infrastructure. The London Plan details these examples, such as health provision, nurseries, schools, play and recreation space.ⁱ

New transport infrastructure can open up sites and boost housing capacity. Barking Riverside is the largest housing development in east London, with planning permission for a significant number of new homes, as well as healthcare, shopping, community and leisure facilities. Significant transport infrastructure must be built to ensure the development is sustainable and, without a rail link, only a small proportion of the planned new homes can be built.ⁱⁱ The Assembly will bring the most up to date figures to the EiP session.

Additionally, low cost transport infrastructure (such as new bus routes) can open up new development sites.

Existing national and London Plan policy prioritises development on brownfield land and a number of organisations have calculated the amount of brownfield land available in London and the resulting capacity of this resource for new homes.

There are, seemingly, no authoritative and up-to-date estimates for the amount of brownfield land and housing capacity within London's boundaries. There are varying estimates for the potential number of new homes.

Since the submission of the Assembly's response to the Draft London Plan, a range of updated figures on London's brownfield capacity for new housing development have been published. The Assembly would wish to bring these to the Panel's attention at the relevant EiP session. These figures will re-enforce the Assembly's argument that more efficient use

of land, aided by the increased use of off-site manufactured housing for example, will contribute significantly to the accommodation of growth within London's boundaries.

Brownfield sites

The Mayor has, to date, released 98 per cent of the former London Development Agency land portfolio for development. The London Land Commissionⁱⁱⁱ has been tasked with identifying further public sector brownfield land that is no longer needed in London. It must ensure that all of the capital's brownfield sites are developed and help meet its target of over 400,000 new homes by 2025.^{iv} The Government will provide £1 million to help establish the Commission which will be jointly chaired by the Mayor and a Government Minister, with representatives of public bodies.

Windfall sites

The changing nature of service provision has the effect of delivering 'windfall sites', for example old hospital facilities and industrial areas. These offer the potential to deliver housing quickly. Sites such as Mount Pleasant, however, suggest that the Mayor should be in a position to respond in a strategic way rather than react in an ad hoc manner (through his planning decisions power).^v

Transport for London (TfL) owns around 5,700 acres of property in London, making it one of the capital's largest landowners. By developing this portfolio, much of it for housing, more than £1 billion in revenue from rents will be generated over the coming ten years.^{vi}

Large amounts of TfL's property are situated at or nearby transport nodes which make them hugely attractive from a developer's point of view and particularly suitable for high-density housing. As a public sector body, TfL's development plans should not focus purely on maximising financial returns. TfL must be expected to use its assets to deliver broader benefits for the city in line with the Mayor's priorities – including helping to meet affordable homes targets.

Affordable housing is part of a suite of benefits, including open spaces and other amenity improvements that will be delivered under the section 106 contributions for these schemes.

In total, there is the potential to deliver around 9,000 residential units, making a significant contribution to the homes London needs. Affordable housing requirements will be established in discussion with the local borough through the planning process.

The TfL property development programme demonstrates that the Mayor can be proactive in this manner and increase the supply of housing sites for London.

The Draft London Plan suggests that London's Opportunity Areas and a smaller number of Intensification Areas have the potential for 562,800 new homes (between 9 and 13 years' housing supply). They now have added importance in the task of accommodating growth and bridging the gap between housing need and supply.

There are adopted frameworks for 130,000 new homes (23 per cent of the potential) while frameworks covering 50 per cent of the new homes are under review. Frameworks with another potential 150,000 homes are proposed or in preparation.

Some Opportunity Areas, such as Kings Cross, are well regarded, while others have been criticised for being over developed and not adhering to the published principles.

Many of the Opportunity Areas rely on significant infrastructure investment (particularly transport) to allow them to support the number of new homes at the densities London needs. However, the approaches to securing the planning and funding needed have been variable in their success and timescale.

Construction of the Northern Line Extension (NLE) at Vauxhall took only nine years to start after the original transport options study. An innovative funding package has been agreed between the Mayor of London and Government, which includes the creation of an Enterprise Zone from 2016, for a period of 25 years.

This approach can be contrasted with the London Riverside Opportunity Area that contains Barking Riverside and has planning permission for up to 10,800 new homes.^{vii} Here, significant delays in providing the necessary infrastructure have prevented delivery of a significant housing site.

Estate regeneration

In the last ten years, 50 estates with over 30,000 homes have undergone regeneration schemes, delivering nearly twice as many new homes on the sites of London's demolished social housing estates as were there before.^{viii} The Assembly will be able to update these figures at the EiP session.

The potential for increasing density can be seen from a few recent estate regeneration schemes that have been delivered or are planned:^{ix}

Once a decision has been made to invest in new homes, there are a variety of options for estate regeneration. These include: demolition and comprehensive redevelopment, additions to existing blocks and smaller infill using underused open space or redundant uses such as garage blocks.^x

Adoption of either approach will be a function of a variety of factors, and can only be made on a case-by-case basis. Demolition and rebuild is most suited to low-density sites, where the existing accommodation is of a poor standard in terms of build quality, space or accommodation type.

Comprehensive and large-scale estate redevelopment is complex and expensive. With the reduction in the amount of grant available, a number of complex financial models have evolved that help realise development and the financial model used will often shape the scale and housing mix of the regeneration scheme.

Smaller scale and infill schemes are less intrusive for existing residents and mean that residents can feel part of the regeneration process. They allow for a net gain in the number of homes without the need for disruptive 'decanting'. Furthermore, this approach can often be delivered relatively quickly. Research suggests that, if all boroughs fully explored this potential, at least 10,000 new homes could be delivered across London from infill sites within the next ten years.^{xi}

Town centre intensification

London's network of more than 1,200 town centres has considerable potential for new homes (particularly for smaller households and even older people). Changes in retail behaviour have opened up space for new homes, and increasing the residential population in town centres has the benefit of supporting the retail offer that remains.

In 2013, the Assembly published a report on town centres with a range of recommendations including that local authorities could consider a managed contraction in favour of a smaller, but more vibrant, retail core, including leisure, health, education and public services. This would also provide more opportunities for well-located and designed high-density housing, especially around stations and transport interchanges.^{xii}

Industrial sites - co-Location with residential

Given that much of the pressure on industrial land comes from residential development, there is the potential to provide commercial space for industrial activity in mixed-use residential environments. Poplar Business Park provides an example of a current development, where light industrial commercial premises are being built on the ground floor under residential towers.

As work and workstyles continue to evolve, there may be more opportunities to integrate work and living. For example, service-based activities in industrial premises tend to be less intrusive, so there may be opportunities for industrial sites to be redeveloped for high density residential and commercial uses.

Other policies opening up new sources of land

- The new presumption in favour of small sites,
- Intensification of industrial premises on industrial land thereby releasing industrial and industrial land for mixed use and through
- Releasing car parks land for housing
- Using factory build homes with shallow foundations to deck over car parks and railway lines and to facilitate developing difficult sites over utilities and sites adjacent to railway lines.
- Developing higher density housing over utilities and next to railway lines

ⁱ London Plan, paragraph 3.86

ⁱⁱ <https://www.lbbd.gov.uk/wp-content/uploads/2014/10/A-summary-of-the-Developers-Main-Planning-Obligations-For-the-Redevelopment-of-Barking-Riverside.pdf>

ⁱⁱⁱ <https://www.london.gov.uk/priorities/housing-land/land-assets/london-land-commission>

^{iv} <https://www.gov.uk/government/news/plans-to-help-deliver-over-400000-homes-for-london-set-out-by-chancellor>

^v <http://www.london.gov.uk/priorities/planning/public-hearings/mount-pleasant-sorting-office>

^{vi} <https://www.tfl.gov.uk/info-for/media/press-releases/2015/march/tfl-receives-huge-response-in-search-for-property-partners>

^{vii} As well as healthcare, shopping, community and leisure facilities

^{viii} Knock it down or do it up? The challenge of estate regeneration, Housing Committee, February 2015
http://www.london.gov.uk/sites/default/files/KnockItDownOrDoltUp_0.pdf

^{ix} Estate regeneration sourcebook, Urban Design London, February 2015

^x Urban Design London has suggested that estate regeneration has the potential to deliver a minimum of 45,000 homes, while infill would deliver a minimum of 33,000 homes – Planning Committee, March 2015

^{xi} Gap in the market: building new homes in London on disused sites, GLA Conservatives, 2014
<http://glaconservatives.co.uk/wp-content/uploads/2014/07/gap-in-the-market.pdf>

^{xii} The future of London's town centres, May 2013
<http://www.london.gov.uk/sites/default/files/Planning%20Committe%20Town%20Centres%20Report%20Final%20cttee%2004.07.13.pdf>